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March 19, 2025

Via Electronic Filing

The Hon. Taryn A. Merkl, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Hernandez v. Happy Street LLC et al*
Case No.: 1:22-cv-06918-DG-TAM

Dear Honorable Magistrate Judge Merkl:

This law firm represents Plaintiff Aaron Hernandez (the “Plaintiff”) in the above-referenced action.

The instant letter respectfully serves as a request to convert the April 10, 2025, settlement conference to a virtual settlement conference.

This is the first request of its kind. Defendants Happy Street LLC, Happy Street Too LLC (together, the “Corporate Defendants”) and Slobodan Radivojevic a/k/a Bob Radivojevic (the “Individual Defendant”, and collectively, the “Defendants”) have neither consented to, nor objected to, the instant request. If granted, the instant request would not affect any other Court-scheduled deadlines.

The basis of this request is that Plaintiff’s counsel has an unavoidable, conflicting, out-of-state travel obligation, beginning Wednesday, April 9, 2025. Converting the in-person settlement conference to a virtual settlement conference at the initially scheduled date and time, would permit the parties to proceed with the settlement conference, as scheduled, without the need to reschedule to a future date and time.

In light of the foregoing, it is respectfully requested that the Court convert the April 10, 2025 settlement conference to a virtual settlement conference.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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